

**UNITED STATES DISTRICT
COURT NORTHERN DISTRICT
OF OHIO EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION**

This document relates to:

Michelle Frost, et al. v. Endo Health Solutions Inc. et al.

Case No. 1:18-OP-46327

MDL No. 2804

Case No. 17-md-2804

Judge Dan Aaron Polster

**DEFENDANTS¹ MOTION TO FILE UNDER SEAL OPPOSITION TO ASHLEY
RACHEL DAWN POE'S MOTION TO INTERVENE AS PLAINTIFF AND CLASS
REPRESENTATIVE AND ACCOMPANYING EXHIBITS**

Pursuant to the directions of Special Master David Cohen, Defendants seek leave to file under seal unredacted versions of the Opposition to Ashley Rachel Dawn Poe's Motion to Intervene as Plaintiff and Class Representative and three exhibits attached thereto, which Defendants originally filed on March 3, 2020. *See* Dkt. 3204. The redacted portions of these documents contain medical information regarding the intervenor, Ms. Poe, that she has requested be kept confidential.

Prior to filing the Opposition brief and exhibits, Defendants contacted Special Master Cohen regarding the proper procedure for filing documents containing potentially confidential medical information. Ex. A. Special Master Cohen directed Defendants to concurrently file redacted copies with the Court and email Ms. Poe's counsel unredacted copies for review, and then file unredacted copies under seal if Ms. Poe determined the medical information should

¹ Several defendants named in this litigation are not subject to personal jurisdiction in this matter. This opposition is filed subject to and without waiving all defenses, including but not limited to lack of personal jurisdiction, failure of service of process, and ineffective service of process.

remain confidential. *Id.* Ms. Poe has now reviewed the documents and requests that the medical information contained therein remain confidential. Accordingly, Defendants seek leave of the Court to file unredacted versions of the Opposition brief and exhibits under seal.

DATED: March 10, 2020

Respectfully submitted,

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CERTIFICATE OF SERVICE

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